



CRS Site EPA Past Response Cost Payment Notice per U.S. v. AK Steel, et al., Case No. 1:10-cv-00996, (Consent Decree entered July 16, 2010)

McWilliams, Douglas A. to: Thomas Nash, Michelle Kerr, Richard Karl

08/13/2010 03:14 PM

Cc: "Furrie, Kristin (ENRD)"

To Whom It May Concern:

This e-mail attaches confirmation of today's payment by Settling Defendants of U.S. EPA Past Response Costs by federal wire transfer in the amount of \$475,000 to satisfy the obligation in Paragraph 61 of the CRS Site RD/RA Consent Decree in the above-referenced matter.

I am also attaching an electronic courtesy copy of the notice letter I used to inform the United States, EPA, and the Regional Financial Management Officer of this EPA Past Response Cost payment as required by Consent Decree Paragraph 61.

Sincerely,

Douglas A. McWilliams
Squire, Sanders & Dempsey L.L.P.
4900 Key Tower
127 Public Square
Cleveland, OH 44114-1304
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Confirmation of EPA Past Cost Wire Trasfer 8-13-10.PDF



CRS Site Notice Letter for EPA Past Cost Payment 8-13-10.PDF

**CRS - Well Sampling**

Patrick Steerman to: Kerr.Michelle, larry.antonelli
Cc: "Peeples, Jim"

09/16/2010 01:25 PM

Michelle:

In the past we have discussed Brown & Caldwell's recommendation to the Group is for collection of groundwater samples from some CRS wells to look at any changes since the wells were last sampled in 2003. Since the proposed sampling is not a requirement of the Consent Decree or Statement of Work, we do not see that it is necessary to wait until the RDWP is approved. Brown & Caldwell is preparing a summary which discusses wells to be sampled and sampling and analytical methods and a copy will be provided for your files. Once laboratory results are received and verified, a copy of field information and the laboratory results will be provided to U.S. EPA and Ohio EPA.

Brown & Caldwell is coordinating the sampling of two wells with BASF and the exact sampling date will be finalized on Monday. However, it is expected that the wells will be sampled next Wednesday or Thursday, September 22nd/23rd.

If you have any questions, please give me a call or respond to this message.

Best Regards,

Pat

Patrick S. Steerman

**Steerman Environmental
Management & Consulting, LLC**

422 Creek View Lane
Roswell, Georgia 30075
770.992.2836 - Office
404.421.3275 - Cell
404.329.9006 - Fax
psteerman@charter.net



Re: CRS Site Goundwater Sampling Scheduled for this Week



Michelle Kerr to: Peeples, Jim

09/22/2010 05:55 PM

Cc: 'Alison Pirc', 'Andrea Tozer', 'Bob Conger', 'Bruce Martin', 'Bryan Stolte', 'Daniel Flynn', 'David Graham', 'Doug McWilliams', 'Emily Huggins', 'Krebs, James', 'Karen Burlingame', 'Ken Bird',

Hello, thank you--hope it goes fine.

MK

Michelle Kerr
US EPA Region 5 Superfund Division
Remedial Project Manager
77 W. Jackson Blvd. SRF 6J
Chicago, IL 60604
Fx: 312.697.2658
T: 312.886.8961

"Peeples, Jim"

Michelle, Please see the attached letter regardin...

09/20/2010 01:51:57 PM

From: "Peeples, Jim" <JPeebles@brwnald.com>
To: Michelle Kerr/R5/USEPA/US@EPA
Cc: Patrick Steerman <psteerman@charter.net>, "Larry Antonelli@epa.state.oh.us" <larry.antonelli@epa.state.oh.us>, 'Ken Bird' <kbird@cummingsriter.com>, 'Alison Pirc' <apirc@ssd.com>, 'Andrea Tozer' <atozer@mofo.com>, 'Bob Conger' <bob.conger@celanese.com>, 'Bruce Martin' <Bruce_martin@averydennison.com>, 'Bryan Stolte' <bryan.stolte@alcatel-lucent.com>, 'Daniel Flynn' <daniel.flynn@celanese.com>, 'David Graham' <dbgraham@kaufcan.com>, 'Doug McWilliams' <dmcwilliams@ssd.com>, 'Emily Huggins' <Emily.Huggins@thompsonhine.com>, 'Karen Burlingame' <karen.burlingame@goodyear.com>, 'Irmencin@sherwin.com' <Irmencin@sherwin.com>, 'Mary Donahue' <madonahue@ashland.com>, 'Michael Leon' <MHLeon@uss.com>, 'Peter Hsiao' <phsiao@mofo.com>, 'Richard Menozzi' <rlmenozzi@uss.com>, 'Rick Holcomb' <rick.holcomb@conti-na.com>, 'Robert Kovalak' <robert.kovalak@akzonobel.com>, 'Stephanie Vess' <Stephanie.Vess@celanese.com>, 'Steven Roach' <sgroach@ashland.com>, 'Sue Steinwall' <ssteinwall@fredlaw.com>, 'Krebs, James' <jkrebs@brwnald.com>
Date: 09/20/2010 01:51 PM
Subject: CRS Site Goundwater Sampling Scheduled for this Week

Michelle,

Please see the attached letter regarding the voluntary groundwater sampling event that we will be completing later this week. The purpose of the sampling event is to obtain more recent information from monitoring wells at the CRS Site to allow us to better assess the current conditions as we go into the Remedial Design.

If you have any questions about the sampling, please call me at your convenience. We have scheduled to complete this sampling on Wednesday and Thursday of this week.

Sincerely,

James Peeples, P.E.
Brown and Caldwell
JPeebles@brwnald.com

T 614.410.3081 | C614.288.7201

[attachment "CRS Groundwater Sampling.pdf" deleted by Michelle Kerr/R5/USEPA/US]



CRS Site - Notification of Discovery of DNAPL

Patrick Steerman to: Michelle Kerr

Cc: Thomas Nash, larry.antonelli

09/30/2010 11:02 AM

Dear Michelle:

The purpose of this communication is to follow-up on the voice mail message that I left for you on September 29, 2010 and our conversation earlier this morning. As you know from our prior discussions, Brown & Caldwell sampled bedrock wells at the site on September 24th to update the RI/FS information in preparation for starting work proposed in the draft RDWP. The last well to be sampled was MW-6. This is the well that had relatively high dissolved-phase COC concentrations during the RI/FS sampling. When the well cap was opened, a strong odor was observed and a dark, oily material coated the interface probe, preventing Brown and Caldwell from establishing the thickness or nature of the free-phase material in the well. A bailer was lowered into the well and when removed was coated with the oily material. Because Brown & Caldwell was not prepared for sampling or evaluation of this type of material and was concerned about following proper health and safety protocol, the bailer was left in the well and I was notified along with members of the Settling Performing Defendants RD/RA Group (the Performing Parties) of the initial observations.

At the time, the nature of the oily material was not defined. The Performing Parties instructed Brown & Caldwell to mobilize to the site and determine if the oily material was a dense or light non-aqueous phase liquid (DNAPL or LNAPL) or both. Brown & Caldwell mobilized to the site on September 29th and determined based on field observations that the material observed in well MW-6 was most likely composed of both DNAPL and LNAPLs. Samples were taken of the both phases and the water between and the samples were submitted to the laboratory for analysis.

The Statement of Work (SOW), which is an attachment to the Consent Decree (CD), requires the Performing Parties to notify U.S. EPA if DNAPL is encountered during RD/RA activities. The SOW requirements are specifically for DNAPL encountered in sumps and/or as part of drilling activities. While the work performed was not a requirement of the CD or SOW and DNAPL was discovered in a groundwater monitoring well, not soil or one of the sumps, the Performing Parties decided to provide this notice.

The schedule included in the Remedial Design Work Plan requires the Performing Parties to submit the Additional Groundwater Studies Plan to U.S. EPA on February 22, 2011 with field work beginning during May 2011. Based on the current findings, the Performing Parties will propose supplemental investigation in the area of well MW-6. The results of this investigation will provide additional information to be considered when developing the Additional Groundwater Studies Work Plan and will better define the extent of the source material identified at MW-6. The current findings should not affect the schedule for the Additional Groundwater Studies Work Plan. Brown & Caldwell and the Technical Committee are developing the scope for supplemental investigation and a

plan will be developed and submitted to U.S. EPA and Ohio EPA after we receive the final laboratory results confirming the nature of the material. The plan will be implemented after discussion with you and receiving your approval of the anticipated scope

It is expected that the results of this additional investigation will help determine the proper scope of the Additional Groundwater Studies Work Plan. It is not anticipated at this time that the overall Remedial Design schedule provided in the RD work Plan will be impacted.

If you have any questions regarding conditions encountered or future plans, please do not hesitate to call me at (770) 992-2836.

Best Regards,

Pat

Patrick S. Steerman

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psteerman@charter.net



CRS Site - Summary of Field Activities

Patrick Steerman to: Michelle Kerr

10/09/2010 10:31 AM

Michelle:

Attached is a technical memo that Brown & Caldwell prepared and submitted to me that documents field activities on September 24th and 29th. As we have discussed, analyses for the samples collected have not been received from the laboratory but will be provided after Brown & Caldwell performs a quality control review of the data and the data is in final form.

If you have any questions, please give me a call or respond to this message.

Best Regards,

Pat

Patrick S. Steerman

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10-09-10 CRS Brown & Caldwell Summary Field Sampling.pdf



RE: CRS site
Patrick Steerman to: Michelle Kerr
Cc: "'Peeples, Jim'"

10/18/2010 01:03 PM

History: This message has been replied to.

Michelle:

We still hope to submit Brown & Caldwell's investigation plan sometime this week. However, Brown & Caldwell will need to wait until you have reviewed and approved the plan before they schedule with a drilling company. You said that your review will only take a week but there may be the need to address any questions that you may have regarding the work. I expect that they have or will be talking with a drilling company in anticipation of performing the planned scope of work. I don't expect that they will be ready to mobilize on November 1st.

Jim Peeples

Assuming that Michelle reviews the plan and provides approval, say on October 27th, how soon will it take to schedule with a drilling company to be on-site. Please respond to Michelle, and me, so that we will have an idea of when the work may begin. I believe Michelle plans to visit the site at some time during the field investigation and we need to give her an idea of when we may begin and the length of the field work. I am sure she needs to fit this into her schedule so the sooner we know the better.

Best Regards,

Pat

Patrick S. Steerman

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psteerman@charter.net

From: Kerr.Michelle@epamail.epa.gov [mailto:Kerr.Michelle@epamail.epa.gov]
Sent: Monday, October 18, 2010 12:29 PM
To: psteerman@charter.net
Subject: CRS site

Hi Pat, is Brown & Caldwell still looking to go out 11/1/10?

Michelle Kerr
US EPA Region 5 Superfund Division
Remedial Project Manager
77 W. Jackson Blvd. SRF 6J
Chicago, IL 60604
Fx: 312.697.2658
T: 312.886.8961



CRS Site, Elyria, Ohio - Additional Investigation Plan

Peeples, Jim to: Michelle Kerr

10/26/2010 01:09 PM

Cc: Larry Mencin, "McWilliams, Douglas A." , Patrick Steerman,
Thomas Nash

History: This message has been forwarded.

Michelle,

Please see the attached plan that is submitted on behalf of the CRS Site Performing Settling Parties for additional investigation work to be completed at the CRS Site in Elyria, Ohio. The additional investigation is in response to the detection of non-aqueous phase liquid (NAPL) in well MW-6 during a recent sampling event, which was recently reported to you and discussed with you. The primary purpose of the investigation is to identify a source for the NAPL in the area upgradient of well MW-6.

Please call if you have any questions.

Sincerely,

James Peeples, P.E.

Brown and Caldwell

JPeebles@brwnclld.com

T 614.410.3081 | C614.288.7201



CRS MW-6 Area Investigation 10-26-10.pdf



Re: CRS site NAPL investigation sampling 
DONALD BRUCE to: Michelle Kerr

11/08/2010 03:23 PM

OK. Thanks.

Re: CRS site NAPL investigation sampling



Re: CRS site NAPL investigation sampling 

Michelle Kerr to: DONALD BRUCE

11/08/2010 02:46 PM

We are in touch about this work and supposed to talk again tomorrow, though Larry Antonelli of OEPA was not able to make the call this morning and was out all last week. No approval will go out until his questions/comments are addressed.

Michelle Kerr
T: 312.886.8961

DONALD BRUCE

The letter looks fine Michelle. I assume OEPA p...

11/08/2010 01:44:54 PM

From: DONALD BRUCE/R5/USEPA/US
To: Michelle Kerr/R5/USEPA/US@EPA
Date: 11/08/2010 01:44 PM
Subject: Re: CRS site NAPL investigation sampling

The letter looks fine Michelle. I assume OEPA participated in the conference call and commenting?

CRS site NAPL investigation sampling



CRS site NAPL investigation sampling

Michelle Kerr to: Donald Bruce

11/08/2010 12:00 PM

[attachment "NAPL work approval EPA to CRS group 101108.doc" deleted by DONALD BRUCE/R5/USEPA/US]

Don, letter approving limited additional investigative work (soil borings and samples, NAPL samples) at CRS site to find the source of the NAPLs around MW-6 and define the surface of the bedrock. Please let me know if it looks ok. Thanks!
Michelle

Michelle Kerr
T: 312.886.8961



Fw: CRS Additional Investigation Notification , Elyria, OH
Michelle Kerr to: larry.antonelli

11/08/2010 09:55 AM

Michelle Kerr
US EPA Region 5 Superfund Division
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----- Forwarded by Michelle Kerr/R5/USEPA/US on 11/08/2010 09:55 AM -----

From: "Peeples, Jim" <JPeebles@brwnald.com>
To: Michelle Kerr/R5/USEPA/US@EPA
Cc: "Larry R. Mencin" <lrmentin@sherwin.com>, Patrick Steerman <psteerman@charter.net>, "McWilliams, Douglas A." <DMcWilliams@ssd.com>
Date: 11/05/2010 07:15 AM
Subject: FW: CRS Additional Investigation Notification, Elyria, OH

Michelle,

I have provided answers below to your questions/comments regarding the CRS investigation that we plan to complete November 17 - 19. We can discuss these further in our call which we have tentatively scheduled for 10:00 AM Central on Monday November 8, 2010. I will wait for your confirmation that this time is OK with you before sending out a formal meeting invitation. I have also attached the laboratory data packages for the two sampling events that have been completed at the site to date. The first data package corresponds to the groundwater sampling for wells L-2, L-3, MW-5, and MW-16 that was completed on September 23. The second package is for the sampling of well MW-6 that was completed on September 29th. Both data packages are considered preliminary as the data validation is not yet complete on these data packages. They are being transmitted to you to allow you to obtain a better understanding of the nature of the impact identified at MW-6 and to provide a preliminary view of the analyses completed on the other site groundwater samples. The final data packages will be transmitted to you after the data validation is complete.

The groundwater samples indicate only minor impact in the monitoring wells, with the exception of MW-6. The wells that are located on BASF property (across Locust Street from the CRS Site – wells L-2 and L-3) had only one low level detection of chloroform. These wells are completed in the Berea Sandstone. Wells MW-5 and MW-16 are two of the three wells completed in the Berea Sandstone on the CRS property. These wells had detections or J-values for several compounds at very low level, which is consistent with data obtained at these wells during the RI. In general, the concentrations observed in this sampling event were lower than those obtained during the RI.

The second data package includes samples for MW-6 and has three analytical results. The first two analyses, MW-6A and MW-6B, are for water samples that were collected and were in contact with NAPL material in the sample vials from the time of collection until the samples were analyzed. Sample MW-6A was in contact with material that was identified as LNAPL in the well, although the material was difficult

to obtain in quantity and tended to stick to the sides of the vials. Sample MW-6B was water that was in contact with the DNAPL material obtained from MW-6 from the time that the sample was collected until it was analyzed. The third analysis in this data package is an analysis performed on the DNAPL material itself. Note that the analyses include a few compounds that can be obtained from either VOC or SVOC scans due to the time at which they elute from the GC column. These compounds are typically reported with the SVOC analyses, but were reported in this package due to the fact that not enough DNAPL or LNAPL material was present to complete an SVOC analysis. The important finding from these intermediate compounds is the presence of naphthalene at relatively high concentration in the water samples and in the DNAPL sample. There was not sufficient LNAPL material present in any of the vials or in a combination of the vials to complete VOC or SVOC analyses.

We plan to complete additional sampling at well MW-6 during this next mobilization, to re-run the VOC analyses (to corroborate the results) and to run SVOC analyses. The analyses will be run only on the NAPL material. The LNAPL material will be concentrated during the sampling event into a single container that will include only the LNAPL to avoid the problem encountered on September 29th when the LNAPL adhered tightly and in a thin layer to the glass vial (due presumably to the very hydrophobic nature of the material).

Please see our responses to your questions/comments transmitted by email on November 1, 2010 (below).

EPA Comments/Questions:

Why at this time is the study only looking up-gradient of MW-6?

There are two lines of evidence that have led us to look in the current direction for a NAPL source. The primary piece of evidence is that the groundwater at MW-6 was observed to be impacted with the constituents that we are now finding in the DNAPL at this well when it was sampled in 2002. At that time there was no sign of NAPL in the well. Given that the groundwater gradient is in the direction of the river, and that dissolved-phase components were being observed at well MW-6 in 2002, the assumption has been made that the DNAPL source is in the upgradient direction of MW-6. Second, the former Rodney Hunt stills are located in the upgradient direction from MW-6 and these stills would likely have been used to separate chlorinated species during solvent recycling activities. Releases from the still(s) may be the source of the observed NAPL. Overall, this has directed us, at least initially, to the area upgradient of MW-6. The overall purpose of the investigation will be to identify locations where NAPL may have entered the bedrock in the vicinity of the former Rodney Hunt stills, thereby providing information needed to select locations for bedrock borings and wells that will be added to the Additional Groundwater Studies Work Plan. Of course, if we are not able to find evidence that the DNAPL entered the bedrock in this area, we will likely need to investigate in other directions as part of the Additional Groundwater Studies work. We believe it is reasonable to start the process by looking in the most likely direction.

What is the criterion used to define evidence of free-phase NAPL in soil?

We are primarily looking for soil zones with heavy impact. This will be identified visually and with head-space readings. We recognize that there are other field methods for identifying NAPL in soil, but our past experience with these methods has been mixed. For this initial evaluation of the area, we feel that the straight-forward techniques of observation coupled with head-space readings will be adequate

to identify locations where laboratory samples should be taken and where future investigation may be focused if the laboratory analyses confirm the field observation of heavy soil impact. We are not focusing on finding a NAPL source within the soil column above the bedrock. Rather we are trying to find a location where the NAPL may have traveled through the soil to reach bedrock. This will help in identifying locations downgradient in the bedrock where the lateral and vertical extent of the plume from the source area can be defined in future investigations.

How is the fact that PCBs are soil contaminants of concern addressed by the draft Health & Safety Plan (HASP)?

PCBs were observed at relatively low level in some site soil samples and should have been included in the HASP. They will be added to the COCs in the HASP.

Which data will be collected that help define soil saturation with NAPL?

Samples that are sent to the laboratory for will be analyzed for VOCs, SVOCs, and TPH fractions. Saturation will be defined by the cumulative content of the samples for organic constituents in comparison to the available pore space (taking moisture content into consideration). However, it is not necessary that a soil column be saturated with organic constituents to be considered a likely pathway by which free product could have made its way to the bedrock surface. It is more important for this investigation to identify the locations where NAPL traveled to the bedrock. We are not really expecting to find a residual source of NAPL material in the more permeable soils located above the bedrock.

When are the preliminary analytical results from September going to be available?

Preliminary results are available now and are attached for your review. The data are undergoing validation and final results are not yet available.

Will waste profiles be included in the final report?

Waste profiles and manifests for all materials shipped off-site will be included in the Remedial Design Report.

The Quality Assurance Project Plan, Field Sampling Plan, and HASP submitted with the Remedial Design workplan are still under review, but I haven't seen any major issues that present an obstacle to proceeding with this study.

We will plan to complete this investigation in accordance with the QAPP, FSP, and HASP that were submitted with the Remedial Design Work Plan (incorporating the change to the HASP noted above).

Monday the 8th or Friday the 12th I would be available if you'd like to have a conference call discussing the study.

We have tentatively set a time of 10:00 AM Eastern for a call to discuss the field investigation with you. Please let me know if this time is OK with you and we will send out a formal meeting invitation.

Sincerely,

James Peebles, P.E.

Brown and Caldwell

JPeebles@brwnclad.com

T 614.410.3081 | C614.288.7201



A01270433.pdf



A01290542.pdf



RE: CRS Site - EPA Approval of Investigation Plan
Patrick Steerman to: Michelle Kerr

11/10/2010 06:05 PM

Thank you for responding so quickly. Have a good holiday and I will wait for your approval. See you on November 18th.

Best Regards,

Pat

Patrick S. Steerman

**Steerman Environmental
Management & Consulting, LLC**

422 Creek View Lane
Roswell, Georgia 30075
770.992.2836 - Office
404.421.3275 - Cell
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psteerman@charter.net

From: Kerr.Michelle@epamail.epa.gov [mailto:Kerr.Michelle@epamail.epa.gov]

Sent: Wednesday, November 10, 2010 6:16 PM

To: Patrick Steerman

Cc: larry.antonelli@epa.state.oh.us

Subject: Re: CRS Site - EPA Approval of Investigation Plan

Yes, I was drafting a response to the work plan and was referring to it. I understand approval is needed in order to proceed. I spoke with Larry Antonelli at OEPA Tuesday, and he was going to send questions/comments to you directly if he had any. So far, I haven't seen any correspondence, and both agencies are closed tomorrow for Veterans' Day. It's my plan to issue the response Friday when I return to the office.

Michelle Kerr
US EPA Region 5 Superfund Division
Remedial Project Manager
77 W. Jackson Blvd. SRF 6J
Chicago, IL 60604
Fx: 312.697.2658
T: 312.886.8961

-----"Patrick Steerman" <psteerman@charter.net> wrote: -----

To: Michelle Kerr/R5/USEPA/US@EPA

From: "Patrick Steerman" <psteerman@charter.net>

Date: 11/10/2010 07:37AM

Subject: CRS Site - EPA Approval of Investigation Plan

Michelle:

You called earlier this week regarding distribution of correspondence and I said that you should send it directly to me. We did not discuss the document that you would be sending. Is this an approval of the investigation plan? As you would expect, the Group needs approval of the plan before performing this work.

Best Regards,

Pat

Patrick S. Steerman

**Steerman Environmental
Management & Consulting, LLC**

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Roswell, Georgia 30075
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404.329.9006 - Fax
psteerman@charter.net



RE: Chemical Recovery Systems site NAPL investigation

Patrick Steerman to: Michelle Kerr

Cc: larry.antonelli, Irmencin, JPeebles, KFurrie

11/12/2010 05:37 PM

Michelle:

Thank you for providing a copy of the approval. Brown and Caldwell and the Group will ensure that requirements outlined in the letter are followed.

We look forward to meeting with at the site on November 18th and discussing the current investigation and the site in general.

Best Regards,

Pat

Patrick S. Steerman

**Steerman Environmental
Management & Consulting, LLC**

422 Creek View Lane

Roswell, Georgia 30075

770.992.2836 - Office

404.421.3275 - Cell

404.329.9006 - Fax

psteerman@charter.net

From: Kerr.Michelle@epamail.epa.gov [mailto:Kerr.Michelle@epamail.epa.gov]

Sent: Friday, November 12, 2010 4:48 PM

To: psteerman@charter.net

Cc: larry.antonelli@epa.state.oh.us; Irmencin@sherwin.com; JPeebles@brwnncald.com;
KFurrie@ENRD.USDOJ.GOV

Subject: Chemical Recovery Systems site NAPL investigation

Hello, please see attached regarding investigation around MW-6.

Michelle Kerr
US EPA Region 5 Superfund Division
Remedial Project Manager
77 W. Jackson Blvd. SRF 6J
Chicago, IL 60604
Fx: 312.697.2658
T: 312.886.8961



Re: CRS Site - EPA Approval of Investigation Plan

Larry Antonelli to: Patrick Steerman, Michelle Kerr

11/15/2010 05:51 AM

Hi folks - I do not have any comments on the upcoming investigation work plan, and concur with Michelle's letter. See you at the site this week. Call me if there are any questions.

regards,
-L. Antonelli

Lawrence Antonelli, MS
Site Coordinator
Ohio Environmental Protection Agency
Division of Emergency and Remedial Response
(v) 330.963.1127
(f) 330.487.0769

>>> <Kerr.Michelle@epamail.epa.gov> 11/10/2010 6:16 PM >>>

Yes, I was drafting a response to the work plan and was referring to it. I understand approval is needed in order to proceed. I spoke with Larry Antonelli at OEPA Tuesday, and he was going to send questions/comments to you directly if he had any. So far, I haven't seen any correspondence, and both agencies are closed tomorrow for Veterans' Day. It's my plan to issue the response Friday when I return to the office.

Michelle Kerr
US EPA Region 5 Superfund Division
Remedial Project Manager
77 W. Jackson Blvd. SRF 6J
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T: 312.886.8961

-----"Patrick Steerman" <psteerman@charter.net> wrote: -----

To: Michelle Kerr/R5/USEPA/US@EPA
From: "Patrick Steerman" <psteerman@charter.net>
Date: 11/10/2010 07:37AM
Subject: CRS Site - EPA Approval of Investigation Plan

Michelle:

You called earlier this week regarding distribution of correspondence and I said that you should send it directly to me. We did not discuss the document that you would be sending. Is this an approval of the investigation plan? As you would expect, the Group needs approval of the plan before performing this work.

Best Regards,

Pat

Patrick S. Steerman

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Ohio Environmental Protection Agency Unless otherwise provided by law,
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CRS work conducted last week

Larry Antonelli to: Michelle Kerr

Cc: Thomas Nash, "Steve Love"

11/22/2010 05:43 AM

History: This message has been replied to.

Hi, Michelle -

Just wanted you to know that the investigatory work went well last week. Too bad the weather was so "yucky" on Thursday when you were there. I was there on Friday until about 1 PM, and returned to the office. They had 39 holes installed and surveyed and things were going well. They did change the scope just a little. They moved the last four or so towards the south of MW-6 due to a contaminated boring they discovered, and the fact that as they advanced north of MW-6 everything looked clean, so they essentially concentrated on a area that appeared impacted. This area was basically west of the Rodney Hunt Still. They only had raw material for 40 borings, but were intending to drill a few more to evaluate cores in the above mentioned suspicious area.

Let me know if you have any questions. I'm in all week except Thursday of course. Wishing you both a very happy Thanksgiving !

regards,
-L. Antonelli

Ohio Environmental Protection Agency Unless otherwise provided by law,
this communication and any response to it constitutes a public record.



RE: Chemical Recovery Systems Superfund Site , Elyria, OH

Patrick Steerman to: Michelle Kerr

12/09/2010 04:37 PM

Michelle:

I talked with Jim Peeples this afternoon. We will attempt to submit a letter responding to RDWP comments on or before December 22nd depending on our ability to have the document reviewed internally. You may not be able to review the letter before the holiday but said you will be in the office part of the following week.

I also talked to Jim about additional monitoring of the vapor probes. The short answer is "it depends". It was originally assumed that there would be additional measurements after the probes were in-place for some period of time, say a month, to allow vapors to enter the probes. Jim said that he would like to review analytical data from the investigation before making a decision on whether or not the vapor probes appear to provide usable and reliable data. If so, he will need to determine which probes would be measured.

So, no decision has been made at this time but is something for us to discuss with you once data is received from the laboratory.

Please give me a call if you have questions or comments.

Best Regards,

Pat

Patrick S. Steerman

**Steerman Environmental
Management & Consulting, LLC**

422 Creek View Lane
Roswell, Georgia 30075
770.992.2836 - Office
404.421.3275 - Cell
404.329.9006 - Fax
psteerman@charter.net

From: Kerr.Michelle@epamail.epa.gov [mailto:Kerr.Michelle@epamail.epa.gov]

Sent: Wednesday, December 08, 2010 5:53 PM

To: psteerman@charter.net

Cc: larry.antonelli@epa.state.oh.us; Irmencin@sherwin.com; JPeeples@brwncauld.com

Subject: Chemical Recovery Systems Superfund Site, Elyria, OH

Hello, please see attached regarding CRS site remedial design work plan.

Thank you,

Michelle Kerr
US EPA Region 5 Superfund Division
Remedial Project Manager
77 W. Jackson Blvd. SRF 6J
Chicago, IL 60604
Fx: 312.697.2658
T: 312.886.8961

**CRS ROD FYI****Michelle Kerr** to: larry.antonelli

01/21/2011 01:45 PM

p. 127, 131 (fig.) describe alternative 6 and pretty clearly indicate the excavation is to address the most contaminated soils. In 2.9.3.6.1: "The lateral extent of the excavation will be determined in the pre-design phase of the project..."

Michelle Kerr
US EPA Region 5 Superfund Division
Remedial Project Manager
77 W. Jackson Blvd. SRF 6J
Chicago, IL 60604
Fx: 312.697.2658
T: 312.886.8961

From: "Watkins, Michael" <MWatkins@Brwncald.com>
To: "Antonelli, Larry" <Larry.Antonelli@epa.state.oh.us>, Michelle Kerr/R5/USEPA/US@EPA, Patrick Steerman <psteerman@charter.net>
Cc: "McWilliams, Douglas A." <Douglas.McWilliams@squiresanders.com>, Thomas Nash/R5/USEPA/US@EPA

Date: Friday, September 07, 2012 10:03AM
Subject: RE: CRS Site - AGWS-S Work Plan Modification

Larry,

The top of the dam elevation should read "681 ft msl". Sorry for the confusion.

Mike

Michael L. Watkins, P.G.

Brown and Caldwell

6055 Rockside Woods Blvd., Suite 350

Independence, OH 44131

(216) 606-1300 General

(216) 606-1309 Direct

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(216) 606-1350 Fax

mwatkins@brwncald.com

From: Antonelli, Larry [mailto:Larry.Antonelli@epa.state.oh.us]
Sent: Friday, September 07, 2012 11:00 AM
To: Michelle Kerr; Patrick Steerman
Cc: McWilliams, Douglas A.; Watkins, Michael; Thomas Nash
Subject: RE: CRS Site - AGWS-S Work Plan Modification

Hi, folks- the change in scope for surface water sampling as part of the AGWS-S is fine on my end as well.

I have a quick question....something doesn't seem right about the vertical relief from the site to the top of the dam. In

the letter from Mike to Pat (dated 9/6/2012), it states that river elevation at the site is approximately 683 ft msl, and the elevation at the top of the dam is approx. 381 ft msl. Is this drop of 302 feet over that distance (~ 2600 ft) accurate?

Thanks,

-L. Antonelli/OEPA

From: Michelle Kerr [<mailto:Kerr.Michelle@epamail.epa.gov>]
Sent: Thursday, September 06, 2012 12:48 PM
To: Patrick Steerman
Cc: McWilliams, Douglas A.; Antonelli, Larry; Mike Watkins; Thomas Nash
Subject: Re: CRS Site - AGWS-S Work Plan Modification

Pat, this modification is acceptable.

Thank you,

Michelle Kerr
 US EPA Region 5 Superfund Division
 Remedial Project Manager
 77 W. Jackson Blvd. SRF 6J
 Chicago, IL 60604
 Fx: 312.697.2658
 T: 312.886.8961

From: Patrick Steerman <psteerman@charter.net>
 To: Michelle Kerr/R5/USEPA/US@EPA, Thomas Nash/R5/USEPA/US@EPA, Richard Karl/R5/USEPA/US@EPA, Larry Antonelli <larry.antonelli@epa.state.oh.us>,
 Cc: "McWilliams, Douglas A." <Douglas.McWilliams@squiresanders.com>, Mike Watkins <MWatkins@Brwncaid.com>
 Date: 09/06/2012 10:07 AM
 Subject: CRS Site - AGWS-S Work Plan Modification

Michelle:

Attached is a letter proposing a modification of the Additional Groundwater Studies Supplemental Work Plan. As we have discussed, we are proposing to reduce the number of surface sampling events to two. The plan originally proposed three rounds but the expected changes in the river level elevation have not been observed. The presence of a dam just downstream of the site

maintains the river level at a base flow elevation.

Please let me know if U.S. EPA approves this change so that we may schedule the next round of samples.

If you have any questions or comments, please give me a call or respond to this message.

Best Regards,

Pat

Patrick S. Steerman

**Steerman Environmental
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422 Creek View Lane

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(770) 992-2836 – Office

(404) 421-3275 – Mobile

psteerman@charter.net[attachment "09-06-12 CRS Site AGWS-S Proposed Surface Water Sampling Modification.pdf" deleted by Michelle Kerr/R5/USEPA/US]

From: "Antonelli, Larry" <Larry.Antonelli@epa.state.oh.us>
To: Michelle Kerr/R5/USEPA/US@EPA

Date: Tuesday, November 13, 2012 10:58AM
Subject: CRS

History:  This message has been replied to.

Hi, Michelle –

After review of the AGWS Report and associated data, I don't have any significant comments. I believe the characterization efforts have documented the current conditions as they relate to historical site operations. I have been in contact with our Central office and technical folks regarding the upcoming TI waiver for ground water at the site, and look forward to working with you and the Group in this effort.

Could you copy me on your comments to the Group on the report please? I would like to take a look at them to see what I have missed. Otherwise, it looked pretty good to me, and I think we have sufficient information to move forward with RD/RA and the TI waiver.

Please contact me if there are questions. I will be in the field at another site for the remainder of this week. I can be reached at 330.268.8623.

Regards,

-L. Antonelli/OEPA/DERR

Lawrence J. Antonelli, MS

Site Coordinator

Ohio Environmental Protection Agency

Northeast District Office

Division of Environmental Response and Revitalization

Voice: 330.963.1127

Fax: 330.487.0769

Email: larry.antonelli@epa.state.oh.us

From: "Antonelli, Larry" <Larry.Antonelli@epa.state.oh.us>
To: Michelle Kerr/R5/USEPA/US@EPA

Date: Thursday, January 03, 2013 08:55AM
Subject: RE: AGWS for CRS Site

History:  This message has been replied to.

Hi, Michelle –

Sorry it has taken such a long while to get back to you. I was out some days sick, and I rarely get sick. In any case, I have pretty much finished my review of the final AGWS. I have no major comments, and have provided the information to Tim Christman, so we can proceed with the TI waiver request. He has pretty much stated (and I agree with him) that if the Agencies can say publicly that there is no off-site receptors, we can likely proceed. I believe the Group has sufficiently shown that no –off-site properties (including surface water) or receptors are at risk from the CRS site based on the conceptual model, as well as chemical and physical data collected.

What I did notice was that in Section 4.3 (Ground Water Seep Identification and Inspections), 3rd bullet, it was stated that a theoretical contribution of flow to the river from the 425' of site shoreline was estimated at 200,000 gpd. The 4th bullet describes a calculated ground water flux from the site to the river ranged from 2,400 – 24,000 gpd depending on the hydraulic conductivity applied. It kind of makes me question the observation that contribution of site ground water to the river low is negligible or very small. I don't really consider 2,400 – 24,000 (gpd) to be negligible. That doesn't really change anything in the long run. Also, the estimated versus the calculated flux to the river from the site varies quite a bit.

Finally, this is minor, but in section 5.3 (2nd paragraph), they call Atrazine a SVOC, but then more accurately describe it as a pesticide/herbicide in the 2nd sentence. Again, not a big deal.

Otherwise, the AGWS report looks good and I'm on board with your comment letter.

Call me if there are any questions,

Regards,

-L. Antonelli

From: Kerr.Michelle@epamail.epa.gov [mailto:Kerr.Michelle@epamail.epa.gov]

Sent: Thursday, December 20, 2012 4:20 PM
To: Antonelli, Larry
Subject: AGWS for CRS Site

Larry, based on our last couple of conversations it seems you are satisfied with the CRS Group's AGWS Report and revisions. We are as well. I am sending the approval letter shortly. If there are any outstanding issues with it from your perspective, please bring them to my attention so we can discuss during review of the TI report. Thanks for your comments thus far!

Happy Holidays,
Michelle

Michelle Kerr
US EPA Region 5 Superfund Division
T: 312.886.8961